

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

Chapter 11

Case No: 22-10943 (MEW)

Judge Wiles

In re:

VOYAGER DIGITAL HOLDINGS INC., et al.,

Debtors.

Motion For Relief Sought And The Return Of Crypto Assets

Dear Honorable Judge,

I respectfully request that the court convert the case to chapter 7 state laws and codes, order the return of all crypto belongings to the creditors, and freeze pay to the executives and return the previous payouts to the executives that you stated was administrative claims; until the lawsuit with the SEC is resolved. It is not ethical and any case to continue the pay of a company who has committed fraud and defrauded its customers. let alone, securities fraud. Taken from the sec.gov website directly.

- fraudulent or unregistered offer or sale of securities, including things like
 - [Ponzi schemes](#)
 - [Pyramid schemes](#)
 - [High-Yield Investment Programs](#)

- Theft or misappropriation of funds or securities
- [Manipulation of a security's price or volume](#)
- [Insider trading](#)
- False or misleading statements about a company (including false or misleading SEC reports or financial statements)
- Failure to file required reports with the SEC

Under state law, a debtor must meet specific eligibility requirements to file for Chapter 11 bankruptcy. One of the main requirements is that the debtor must be able to reorganize its finances and continue with business operations. This has not been done by Voyager and the return of our crypto in a cash amount would make this fall under chapter 7 laws and codes. Had this been done from the beginning, creditors would have their crypto returned by now and there would have been more money in the estate to give to creditors', which is the goal in a bankruptcy is it not? That is what the UCC and Kirkland and Ellis have been saying throughout this case. Which by now, we all know that to not be true as it has been 9 months so far and not a single penny or coin has been returned to creditors.

Furthermore, Voyager Digital Holdings INC., et al., has committed securities and exchange fraud, which is in violation of state laws. The fraudulent activities committed by XYZ Company have had a negative impact on the crypto market, and the financial well-being of its creditors'', and as a result, creditors have suffered significant losses. As such, I request that the court orders the return of all crypto belonging to the creditors of the company in coin and not a dollarized amount. If we are to receive a dollarized amount, that would fall under chapter 7 and not 11. The company did not intend to continue operating and the continued pay for the executives and the over the wall fees charged by the lawyers is a crime against the very nature of the bankruptcy codes and procedures. Not to mention, a crime against the American people.

In addition, the executives of Voyager Digital are currently being sued by the SEC for their role in the fraudulent activities. As such, any pay that they receive from the company should be frozen and previous pay returned, until the lawsuit is resolved, in accordance with state laws.

Therefore, I respectfully request that the court considers our motion and orders the conversion of the case to chapter 7 state laws and codes, and immediately return all crypto belonging to the creditors, and the freezing and return of all pay to the executives until the lawsuit is resolved. Where are the claw backs for this your honor? Why do we as creditors' have to suffer for the negligent actions of Voyager and its executives.

Respectfully submitted,

A. Shehadeh

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